

Improvement of timeliness of inspection reports - completion with minimum errors.

Develop and implement guidelines for reducing the time it takes to complete an inspection report with minimum errors.

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Introduction:

The Occupational Safety and Health Administration was established by the Federal government in 1971¹. South Carolina OSHA (SC OSHA) was given initial approval in December 6, 1972 from Federal OSHA². South Carolina OSHA (SC OSHA) is part of South Carolina Department of Labor, Licensing, and Regulation. SC OSHA covers public (state, county, city, town government) and private employers in the state with the exception of: Maritime employment, federal employers such as, but not limited to United States Postal Service any federal military base³, and any federal employer.

SC OSHA conducts on-site inspections of worksites to determine if the employers are in compliance with SC OSHA rules and regulations and their general duty to provide a safe and healthy worksite. Compliance Officers conduct these inspections and write up reports. They create an inspection report. One report is a computer based system in which the Compliance Officer enters the information. The other report has the written information that was taken while the compliance officer was on the site. The paper report is scanned in to be part of the computer report. Compliance Officers conduct inspections on all types of workplaces in the state of South Carolina. They travel the state to conduct these on-site inspections. The types of inspections can be programmed planned, referral, employee complaint, accident, and fatality inspections. There is an assignment officer who gives Compliance Officers their assignments for the week. South Carolina OSHA has three enforcement groups: General Industry, Construction, and Health. The SC OSHA program is funded by 50 % Federal Funds and 50 % State Funds.

¹ <https://www.osha.gov/osha40/timeline.html>

² https://www.osha.gov/dcsp/osp/stateprogs/south_carolina.html

³ https://www.osha.gov/dcsp/osp/stateprogs/south_carolina.html

Programmed planned inspections are inspections of randomly selected employers in industries that have been found to have a higher incidence rate of injuries and illnesses. These inspections are comprehensive in the scope of the inspection. The entire establishment will be inspected on a comprehensive inspection. Note: All support for manufacturing will also be inspected - warehouse, shipping/receiving, maintenance, outside service areas such as fueling areas, repair shops, and hazardous waste storage.

Referral inspections are when alleged safety and health concerns are noted at a worksite. An example would be a health concern seen by a Safety Compliance Officer or a safety concern seen by a Health Compliance Officer. Referrals may come from other sources such as other government agencies or employers reporting severe accidents as required by regulation. These referrals are reviewed by the SC OSHA staff and a determination is made if an inspection will be conducted. Referral inspections are inspections that are usually partial in scope and limited to the site of the referral only and items related to it. A partial inspection can be expanded to a comprehensive inspection with the permission of the compliance manager. Employee complaints are two specific types. A formal complaint is one where a current employee signs a written complaint alleging a violation of a safety and/or health rule or regulation. The complaint would be reviewed and evaluated to determine if the alleged violation is determined to be a potential violation of OSHA rule/regulation by the SC OSHA staff. If it is determined to be valid, an onsite inspection would be conducted. The other type of complaint is a non formal complaint. A non formal complaint is where a non-employee [i.e. either a former employee, relative, friend, or customer] has alleged safety and health violations. This type of complaint is reviewed by the SC OSHA staff to determine if valid. A letter will be sent to the employer to request a written response on the alleged safety and health items. If the employer does not send

in a written response, the SC OSHA has the option of conducting an onsite inspection of the worksite. Accident investigations are conducted when a workplace accident has occurred. There are specific regulations that require an employer to contact the SC OSHA office within 8 hours in the event of a workplace fatality. An employer has to contact the SC OSHA office within 24 hours in the event of an in-patient hospitalization, amputation, or loss of an eye of an employee that is work related.⁴ The SC OSHA office will review the information provided and determine if an onsite inspection will be conducted. A compliance officer will travel to the worksite to do an onsite investigation to determine how the accident occurred and if the employer was in compliance with the rules and regulations regarding occupational safety and health in the state of South Carolina. An Imminent Danger is when the SC OSHA office is contacted on an alleged specific condition or practice which may immediately cause death or serious physical harm. SC OSHA will send a Compliance Officer within 24 hours to conduct an inspection. A catastrophe investigation is when 3 or more employees are injured in a workplace accident. SC OSHA will send a Compliance officer within 24 hours to conduct an inspection. After the report is completed the report is sent to the Supervisor to be reviewed and sent back to Compliance Officer if correction are required. Accident cases reports and special cases are reviewed by the Supervisor then the Compliance Coordinator and returned to Supervisor to send back to the compliance officer for corrections if necessary.

⁴ <http://www.scosha.llronline.com/index.asp?file=osfat.htm>

Problem Statement:

At the current time it takes too long to complete inspection reports and the reports contain too many errors. This project is to develop and implement guidelines for reducing the time it takes to complete an inspection report with minimum errors. This project will propose several ways to lower the overall lapse time of inspection reports from the current level of 60 to a level of 30 days or less from opening conference.

Data Collection:

The project will use a questionnaire to get feedback from field staff. The review of the information will help develop recommendations for improving overall lapse time. Please see Appendix A. Another tool that would be used is the computer based system data to show the overall lapse time of reports in the system. Please see Appendix B.

Data Analysis:

The data was reviewed to see if there were any basic trends and to develop recommendations for improvement of lapse time.

Question 1 asked how long the compliance officer has worked at SC OSHA:

3 have worked here for 2-3 years, 2 had worked here for 4-5 years and one had worked here for over 5 years. This shows that the overall length that a majority of the staff has been at SC OSHA.

Question 2 asked "What area of the SC OSHA office do you work in?"

The SC OSHA enforcement has three specific areas of General Industry-safety, Health, and Construction-safety. The questions were asked to see if there were any specific differences in the three specific areas.

Question 3 was "Have you been told by management the policy on turning in reports (lapse time)?"

All the employees marked on the survey that yes that have been told by management. This is important that employees understand the policy of lapse time. Reports should be completed and turned to the office and not held. This would help improve overall lapse time.

Question 4 was "Have you been told the lapse time goal for your area?"

All the employees who conducted the survey marked yes. This shows that employees have been given the information on lapse time.

Question 5 was "Have you been told the policy on Inspection Priorities?"

All the employees marked yes. Inspection Priorities deals with which inspection should be conducted first and report completed first by the compliance officer. The inspection priorities are the following:

General Industry Safety:
First: Imminent Danger,
Second: Catastrophe, fatalities, accident
Third: Employee complaints,

Fourth: Power Press Injures,
Fifth: Referral,
Sixth: Follow up/ monitoring,
Seventh: Programmed inspection.

Health:

First: Imminent Danger,
Second: Catastrophe, fatalities, accidents;
Third: Employee complaints;
Fourth: Referrals;
Fifth: Follow-ups/ monitoring inspections;
Sixth: Programmed inspections.

Construction:

First: Imminent Danger,
Second: Catastrophe, fatalities, accidents;
Third: employee complaints;
Fourth: Referrals;
Fifth: Follow-ups/ monitoring inspections;
Sixth: Special Emphasis;
Seventh: Other specific observed violations;
Eighth: Programmed inspection.⁵

Question 6 was "Do you feel that your Supervisor knows your current workload?"

All of the compliance officer marked yes. It is important for the Supervisor to have knowledge of their staff's current inspection load.

Question 7 was "Do you feel that accidents are assigned taking into account your workload and the complexity of the case?"

The results on this question showed that several employees marked no. This could directly affect lapse time of inspection reports. Accidents should be assigned taking into account when the last accident was assigned to the compliance officer and their overall workload. This would help overall lapse time.

⁵ <http://www.scosha.llronline.com/pdfs/fieldmanual.pdf>; page 10 of 128;

Question 8 was "What do you feel would be an acceptable number of lapse days on a planned inspection?"

The results were 1 for 5-10 days, 2 for 10-15 days, and 2 for over 15 days.

Question 9 was "What do you think would be an acceptable number of lapse days on an accident investigation?"

The results were 1 for 30 days, 3 for 45 days, and 1 for 60 days.

Question 10 was "How do you feel that lapse time can be improved?" These were some of the Compliance Officers comments:

"As multiple accident/ fatality assignments are made to only a small group of personal, the lapse time consequently increases on all reports assigned to those personal." "At this point and with the shortage of Compliance Officer's, it's difficult. It will get better as we hire more Compliance Officer's." "A quick response to the case files after the initial review will help decrease the lapse time." After reviewing the responses on the questionnaire recommendations were developed to help SC OSHA.

Recommendations to improve lapse time:**1.) Increase in Field Staff**

With an increase in field staff this will help have the agency's more experienced Compliance Officers conduct the fatality investigations and complex inspections. The SC OSHA office is currently working to add additional staff. A training program is provided to new field staff. They have classroom training, mock inspections, and work with field staff. They attend the OSHA Training Institute for formal training. This training program for new compliance officers lasts for two years, but training is ongoing for the duration of employment. During the first two years of training time, a compliance officer will start conducting their own inspections once they have been approved for solo inspections. This would help lower lapse time in the regard that the more experienced Compliance Officer would be conducting the accident cases.

2.) Compliance Officer Training

Make sure that the field staff understands the inspection priorities. Compliance Officers needs to make sure that they conducting inspections following the inspection priorities. This can be conducted using PowerPoint slides and other formal training. This type of training is given to new compliance officers. This new PowerPoint training would be a refresher for the senior staff. The importance of lapse time can be enforced at these staff meeting. Monthly staff meetings are currently conducted except for the months of June, July, and August.

3.) Develop a computer based spreadsheet that shows when compliance officer last conducted an accident investigation. This would be done to make sure that certain compliance officers are not over burdened with accident(s) which could increase the lapse time for accident and other inspection reports.

4.) Develop a policy that accident cases are put into the computer system and discussed with the Field Supervisor and Compliance Coordinator in the first month. After the accident report has been open for 3 months, Compliance Officer, Supervisor, and Compliance Coordinator need to meet with the Compliance Manager to discuss case. This new policy has been put into place. This new policy insure that the Compliance Officer and Supervisor and keeping track of the lapse time on accident reports. Please see Appendix C.

5.) Develop a manual to ensure that employees understand what information is required for each section of the computer based system. Please see Appendix D. The manual should be updated on a on-going basis to ensure any changes made to the computer system are updated in the manual.

Final Recommendation:

- 1.) Develop a system where these recommendations are reviewed in a 6 months period to see if any adjustment need to be made to the recommendations. A review of the lapse time record in the computer based system should be conducted to determine if there has been improvement. Develop a system to monitor for improvement about every 6 months and adjust accordingly.

Appendix A

Questionnaire to Field Staff

**MEMORANDUM FOR RECORD
CPM Project Questions**

**You do not need to sign
Thank you for your input**

1. How long with SC OSHA?
 - a. 1-2 years
 - b. 2-3 years
 - c. 4-5 years
 - d. 5+ years
2. What area of the SC OSHA office do you work in?
 - a. Safety
 - b. Construction
 - c. Health
3. Have you been told by management the policy on turn in reports (lapse time)?
 - a. Yes
 - b. No
4. Have you been told the lapse time goal for your area?
 - a. Yes
 - b. No
5. Have you been told the policy on Inspection Priorities?
 - a. Yes
 - b. No
6. Do you feel that your direct Supervisor knows your current workload?
 - a. Yes
 - b. No
7. Do you feel that accidents that are assigned are given out taking in your workload, the complexity of the case ?
 - a. Yes
 - b. No
8. What do you feel would be an acceptable number of lapse days on an planned inspection ?
 - a. 5-10 days

- b. 10-15 days
- c. 15 + days

9. What do you think would be an acceptable number of lapse days on an accident investigation?

- a. 30 days
- b. 45 days
- c. 60+ days

10. How do you feel that lapse time can be improved? Please give explain.

Appendix B

Lapse Time Chart

Lapse Time for SC OSHA CPM Project Sam Manning	Open/ Close	Open/ Review	Close/ Review	Review/ Administration	Administration/ Issue	Lapse
2016	24	38	14	14	9	61
2015	16	30	14	12	7	50
2014	11	30	19	12	13	56
2013	10	30	20	8	12	50
2012	8	26	17	6	16	47
2011	5	18	14	7	17	43
2010 OSHA Express system live	4	10	8	5	10	42

2009	6					31
2008	7					33
2007	5					27
2006	7					28
2005	7					31
2004	8					29
2002	9					24
2001	7					22

Appendix C

PowerPoint Presentation

Accident Investigations



- **OSHA'S 6-MONTH STATUTE OF LIMITATIONS**

- **THIS STARTS WITH THE EVENT OF THE ACCIDENT NOT THE DAY THAT THE INSPECTION WAS OPENED.**

1st Month



- **Conduct accident investigation**
 - Interview Witnesses
 - Meet with Fire Department, Police Department and the Coroner (if needed).
 - Photograph and measure the site, determine the who, what, when, where, what, and why leading up to and including the event with the level of supervision and training. Determine employee exposure, employer knowledge, and whether compliance with an OSHA rule or regulation or the general duty clause could have prevented the accident.
- **Enter information into OSHA Express system**

1st Month



- Set up time to meet with Supervisor
- If ready to meet with Compliance Coordinator
 - Tell Supervisor your ready for meeting.
 - ✦ date and time will be set up
- Enter Citation(s) into OSHA Express
 - Computer system that SC OSHA uses to enter inspection reports.

2nd Month



- Once report is open for 30 days
- Start sending your Supervisor a weekly email telling daily activity on accident report.
- In this email need to give daily activity on accident investigation and estimated time when report would be sent for review.

2nd to 3rd Month



- Report sent to be reviewed by Supervisor
- When reports are sent back for correction need to make sure to make correction as quickly as possible.

2nd to 3rd Month



- Report sent to Quality Assurance Manager
 - Report will be reviewed and sent back to Supervisor
- When correction are sent to CSHOs
 - CSHOs need to make sure to conduct corrections as quickly as possible.
 - Confirm that all corrections are made before returning to Supervisor.
- 90 Days open
 - Meeting to be held with Compliance Manager to go over case.

2nd to 3rd Month



- All Reviews have been conducted
- If need to meet with Compliance Manager on case.
 - Examples: Citations not to be issued in case.
 - × Supervisor will set up date and time.
- OK given to conduct Closing conference by Compliance Manager.



- This plan goal is to improve lapse time.
- Any suggestions how lapse time can be improved on accident is welcome.

Appendix D

PowerPoint Presentation

Computer Program



OSHA Express

- OSHA Express
 - Here are some specific guidelines on how to write up a inspection report.
 - There will be a paper report
 - On paper report follow the Report Order Memo



OSHA Express

- Narrative section of report
 - A. Purpose and Scope of Investigation
 - Type of inspection assigned
 - Planned, Accident, Referral, Complaint, Follow up
 - Scope of investigation: (Comprehensive or Partial)
 - Assignment number and when assigned by office
 - Special circumstance(Accident, Plan View Inspection):
 - Assigned by Assignment Officer
 - B. Description of Process
 - What job employer performs...
 - Size of building and site acres



OSHA Express

C. Principal Product

- What employer makes or services provided

D. Opening Conference Notes:

- Explain duties at opening conference
- Subcontractors on site
- Name, distance and travel time to nearest medical facility
- Who at company maintains the OSHA 300 Logs
- Hours of operation, shifts, and office hours



OSHA Express

E. Walkaround Inspection Notes

- Other than Serious violations corrected while on site
- List of any equipment not in use at site
- Photo Log
 - (required on accident, referral, complaint inspection)

F. Closing Conference Notes

- How much longer employer will be on site
- What was discussed at closing
- Recommendation letter information (if being sent)



OSHA Express

- G: Summary of Complaint, Referral, Accident or Follow Up
 - On Accident investigation
 - First paragraph needs to specifically answers the questions that the IMIS manual requires to be answered.
 - IMIS - Integrated Management Systems (IMIS)-Computer based system that OSHA uses to enter information
 - Make sure to use Employee 1, Employee 2, ect.
 - Summary should describe events in chronological order
 - Spell out abbreviations
 - There are 8 questions to answer:



OSHA Express

- (1) What were workers doing, or what process was in progress
- (2) Where the workers were when the events occurred. The description should include significant measurements, such as depth of trench or height of scaffold.



OSHA Express

- (3) What kind of equipment was involved, in any. The description should include the name of the manufacturer, and the model number or the name of the equipment, if available.
- (4) What type of injuries were sustained.



OSHA Express

- (5) What the causal factors of the event were, if evident.
- (6) The general nature of facility where the event occurred, e.g. high rise construction site, chemical plant, petroleum refinery, warehouse, ect.



OSHA Express

- Complaint response and Referral Response
 - Insert complaint items at start of response
- Complaint Response:
 - Explain findings
 - If a citation will be issued related to complaint item explain in response that a citation will be issued.
 - If no citation found end with:
 - “A hazard was not found; therefore a citation was not issued.”



OSHA Express

Follow up Response

- Explain what the employer did to abate (correct/
Eliminate the hazard) the citation.
- If correction was not completed explain why



OSHA Express

- Violation
 - A. Description of Hazard
 - Brief statement of hazard
 - Example: Employee could fall to the ground below
 - Falls
 - Caught in
 - Stuck By
 - B1. How standard violated
- QUALIFY the standard-all parts.
 - Statement on how standard has been violated
 - Personal fall arrest system, guardrail system, or safety net system were not used on roof approximately 16 feet high



OSHA Express

- B2. Evidence of ee exposure
 - How employees were exposed to the hazard
 - 10 employees were seen on apartment building installing new roof. Employees not wearing fall protection.
 - Need EE comment with EE name changed to a number and name in confidential section of the report.
- B3. ER Knowledge of Hazard
 - Need to put employer name and job title and what he said about the violation
 - J. Smith, Foreman said that his equipment was at his shop.



OSHA Express

- B4. Evidence of ee/ er relationship
 - If ee works for ER need to state this; other relationships;
 - subcontractor exposed to rebar;
 - Specify how you know...who directs what work specifically.
- B5. Basis or assigned period
 - If violation corrected while on site; or abatement days given.



OSHA Express

- Instance Page
 - Does not Spell Check
 - Need to be brief in description box
 - How much time in minutes total in a week and how long the condition has existed to help support ER knowledge.
- Measurement Box
 - Explain what was seen
 - Horsepower, rpm, size of fan blade; how high off ground
 - Only part that will print from measurement box is what is seen.
 - If double click to copy information; information will go away



OSHA Express

Additional Info Box:

- Put probability assessment chart here
 - Put calculations under box
 - List out factors (Mitigation and/or Contributing)
 - Any other information



As Follows

- Be specific
- - Do not use “No” at start of sentence.
 - Do not use ~ in “as follows”
 - General Duty Citation have specific wording:
 - Employer knew or should have known that operator using Toyota forklift serial number SG200567 without wearing seatbelt was exposed to the hazard of being crushed by forklift in an event of a tip over. A feasible and useful method to correct this hazard, among other methods, is to ensure operator wears the seatbelt when operating the forklift in the establishment.



Abatement Guideline

- Use to help explain to Employer what will be required to abate/ correct the hazard.
 - Spell out abbreviations
 - Must be approved by Standard Office